Expert Report of Dr. Loren Collingwood

Loren Collingwood

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Executive Summary

I have been retained by plaintiffs as an expert, and have been asked to examine the citizen voting age population (CVAP) of different racial/ethnic categories of the enacted LD-15 as well as several proposed LD-14 districts in 10 remedial maps (1-5, 1A-5A).

To estimate CVAP demographics for each map, I used the recently released 2022 CVAP block group data taken from the U.S. Census.[1] I filter the block groups to those appearing in each respective map (i.e., LD-15 in the enacted plan, or LD-14 in the alternative plans), then sum the total counts for total population, non-Hispanic white alone, Hispanic, and several other minority groups.

Based on my analysis, I conclude the following:

- The enacted plan has a Hispanic CVAP (HCVAP) population of 52.18%
- Maps 1, 1A, 2, 2A have an estimated HCVAP of 52.48%
- Maps 3, 3A, 4, 4A have an estimated HCVAP of 51.04%
- Maps 5, 5A have an estimated HCVAP of 47.96%.
- LD14 is the same in each "A" remedial proposal as the corresponding original proposal. As a result, the performance analysis for LD14 in each "A" map is the same as its corresponding original proposal.

My opinions are based on the following data sources: 2020 US Census block data, 2022 American Community Survey (ACS) block group data, and enacted and alternative Block Assignment files provided to me by counsel.

I am being compensated at a rate of $400/hour. My compensation is not contingent on the opinions expressed in this report, on my testimony, or on the outcome of this case.

Background and Qualifications

I am an associate professor of political science at the University of New Mexico. Previously, I was an associate professor of political science and co-director of civic engagement at the

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[1]The 2022 CVAP estimates were not available prior to January 23, 2024: https://www.census.gov/programs-surveys/decennial-census/about/voting-rights/cvap.html

Center for Social Innovation at the University of California, Riverside. I have published two books with *Oxford University Press*, 42 peer-reviewed journal articles, and nearly a dozen book chapters focusing on sanctuary cities, race/ethnic politics, election administration, and RPV. I received a Ph.D. in political science with a concentration in political methodology and applied statistics from the University of Washington in 2012 and a B.A. in psychology from the California State University, Chico, in 2002. I have attached my curriculum vitae, which includes an up-to-date list of publications, as Exhibit 1 to this report.

In between my B.A. and Ph.D., I spent 3-4 years working in private consulting for the survey research firm Greenberg Quinlan Rosner Research in Washington, D.C. I also founded the research firm Collingwood Research, which focuses primarily on the statistical and demographic analysis of political data for a wide array of clients, and lead redistricting and map-drawing and demographic analysis for the Inland Empire Funding Alliance in Southern California. I was the redistricting consultant for the West Contra Costa Unified School District, CA, independent redistricting commission in which I was charged with drawing court-ordered single member districts. I was the redistricting consulting with Roswell, NM, Independent School District to draw single member districts.

I served as a testifying expert for the plaintiff in the Voting Rights Act Section 2 case *NAACP v. East Ramapo Central School District*, No. 17 Civ. 8943 (S.D.N.Y.). I am the quantitative expert in *LULAC vs. Pate (Iowa)*, 2021, and have filed an expert report in that case. I am the BISG expert in *LULAC Texas et al. v. John Scott et al. (1:21-cv-0786-XR)*, 2022. I filed two reports and have been deposed in that case. I was the RPV expert for the plaintiff in *East St. Louis Branch NAACP, et al. vs. Illinois State Board of Elections, et al.*, having filed two reports in that case. I was the Senate Factors expert for plaintiff in *Pendergrass v. Raffensperger (N.D. Ga. 2021)*, where I filed two reports, was deposed, and testified at trial. I was the RPV expert for plaintiff in *Johnson, et al., v. WEC, et al., No. 2021AP1450-OA*, having filed three reports in that case. I was the RPV expert for plaintiff in *Faith Rivera, et al. v. Scott Schwab and Michael Abbott*. I filed a report, was deposed, and testified at trial. I served as the RPV expert for the intervenor in *Walen and Henderson v. Burgum and Jaeger No 1:22-cv-00031-PDW-CRH*, where I filed a report and testified at trial. I was the RPV expert in *Lower Brule Sioux Tribe v. Lyman County* where I filed a report. I was the RPV expert for plaintiff in *Soto Palmer et al. vs. Hobbs et al.*, where I filed two reports, was deposed, and testified at trial. I was the RPV expert for plaintiff in *IE United et al. v. Riverside County, CVRI2202423*, where I filed a report and was deposed. I was the RPV expert for plaintiff in *Paige Dixon v. Lewisville Independent School District, et al., Civil Action No. 4:22-cv-00304*, where I filed two expert reports. I was the RPV expert for plaintiff in *Turtle Mountain Band of Chippewa Indians v. Jaeger No. 3:22-cv-00022-PDW-ARS*, where I filed two reports, was deposed, and testified at trial.
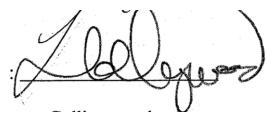
Proposed Maps

Plaintiffs have proposed 10 maps, and in several LD-14 is the same. Each map's 2022 ACS Citizen Voting Age Population (CVAP) demographics are presented in Table 1 below.[2] I also include estimates for the enacted LD-15.[3]

Table 1. Demographics 2022 CVAP.

Map	HCVAP	WCVAP	BCVAP	NCVAP	ACVAP
Enacted D15	52.18	42.73	1	0.96	1.18
Map 1 D14	52.48	36.83	1.07	5.33	1.57
Map 1A D14	52.48	36.83	1.07	5.33	1.57
Map 2 D14	52.48	36.83	1.07	5.33	1.57
Map 2A D14	52.48	36.83	1.07	5.33	1.57
Map 3 D14	51.04	38.36	1.01	5.25	1.6
Map 3A D14	51.04	38.36	1.01	5.25	1.6
Map 4 D14	51.04	38.36	1.01	5.25	1.6
Map 4A D14	51.04	38.36	1.01	5.25	1.6
Map 5 D14	47.96	41.86	1.07	5.04	1.46
Map 5A D14	47.96	41.86	1.07	5.04	1.46

LD14 in each "A" remedial proposal is the same as in the corresponding original proposal. For example, LD14 is the same in Maps 1 and 1A, 2 and 2A, 3 and 3A, 4 and 4A, and 5 and 5A. Thus, the performance of LD14 in each "A" remedial proposal is also the same as in the corresponding original proposal, as reported in my December 1, 2023, report.

Pursuant to 28 U.S.C. § 1746, I, Loren Collingwood, declare the foregoing is true and correct.

Dr. Loren Collingwood

Dated: February 23, 2024

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[2] Estimates for white, Black, Asian/Pacific Islander, and Native American are non-Hispanic single race.

[3] HCVAP = Hispanic CVAP, WCVAP = White CVAP, BCVAP = Black CVAP, NCVAP = Native American CVAP, ACVAP = Asian/Pacific Islander CVAP.